

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

**In Re:** :  
**LUIS MIGUEL RIVERA,** : Bankruptcy No. 25-10875-pmm  
**Debtor** : Chapter 13  
**Freedom Mortgage Corporation** :  
**Movant** :  
:  
:  
**v.** :  
**LUIS MIGUEL RIVERA** : 11 U.S.C. §362  
  
**and**  
**SCOTT F. WATERMAN [Chapter 13], ESQUIRE**  
**(TRUSTEE)**

**Respondent(s)** :

**CERTIFICATION OF NO ANSWER REGARDING FREEDOM MORTGAGE CORPORATION'S  
MOTION FOR RELIEF FROM STAY (DE 23)**

The undersigned hereby certifies that, as of July 2, 2025, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before July 1, 2025.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: July 2, 2025

Respectfully submitted,

Brock & Scott, PLLC

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439  
Mario Hanyon, PA Bar No. 203993  
Ryan Srnik, PA Bar No. 334854  
Jay Jones, PA Bar No. 86657  
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and  
**SCOTT F. WATERMAN [Chapter 13], ESQUIRE**  
**(TRUSTEE)**

**Respondent(s)** :

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on July 2, 2025 to the following:

LUIS MIGUEL RIVERA  
1925 READING AVENUE  
READING, PA 19609

MICHAEL A. CIBIK, Debtor's Attorney  
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SCOTT F. WATERMAN [Chapter 13], Bankruptcy Trustee  
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*/s/Andrew Spivack*  
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